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Counsel for Defendant, Michael Tomada

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,)	No.: CR14-0285 JST
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER AUTHORIZING BAIL
v.)	MODIFICATION
)	
MICHAEL TOMADA)	Date: October 10, 2014
)	Time: 9:30 a.m.
Defendant.)	Court: Honorable Jon S. Tigar
)	
)	
)	

1. On June 5, 2014, a detention hearing was held and the Court ordered Mr. Tomada released with certain conditions, including a restriction on his travel outside of the Northern District. Currently, Mr. Tomada is allowed to travel to the Eastern District for work purposes.
2. Mr. Tomada has been abiding by the terms of his pretrial release conditions and now seeks a minor modification of those conditions.
3. Mr. Tomada seeks to modify his pretrial release conditions to allow him to travel to the Eastern District for medical purposes. Mr. Tomada makes this request because his doctor is located at the Kaiser Medical Center in Vallejo.
4. In sum, Mr. Tomada respectfully requests that his conditions of pretrial release be modified to allow him to travel to the Eastern District for medical appointments.

1 5. Neither the government nor pretrial services objects to the request that Mr. Tomada's
2 conditions of pretrial release be modified to allow him to travel to the Eastern District for
3 medical appointments.
4

5 **It is so stipulated.**

6
7 August 18, 2014
8 Dated

/s/
Kevin Barry
Assistant United States Attorney

9
10 August 18, 2014
11 Dated

/s/
Nicole Giacinti
Counsel for Michael Tomada

12
13 **It is so ordered.**
14

15 8/22/14
16 Dated

Kandis Westmore
The Honorable Kandis Westmore,
United States Magistrate Judge